

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WCA HOLDINGS III, LLC

Plaintiff,

-against-

PANASONIC AVIONICS CORPORATION,

Defendant.

Case No. 1:20-cv-7472 (GHW)

**DECLARATION OF
WANDA D. FRENCH-BROWN**

I, WANDA D. FRENCH-BROWN, hereby declare, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a partner with Loeb & Loeb LLP, attorneys for Defendant Panasonic Avionics Corporation (“Panasonic”). I am fully familiar with the facts set forth herein, and respectfully submit this Declaration in support of Panasonic’s Motion to Dismiss the Amended Complaint of Plaintiff WCA Holdings III, LLC (“WCA”).

2. Attached hereto as **Exhibit 1** is a true and correct copy of the Amended Complaint filed in this action on December 3, 2020 (Dkt. No. 27).

3. Attached hereto as **Exhibit 2** is a true and correct copy of the 2010 General Terms Agreement (“GTA”) Between Panasonic and WCA, dated June 29, 2010.

4. Attached hereto as **Exhibit 3** is a true and correct copy of Amendment No. 1 to the GTA, dated October 19, 2012.

5. Attached hereto as **Exhibit 4** is a true and correct copy of Amendment No. 2 to the GTA, dated November 16, 2012.

6. Attached hereto as **Exhibit 5** is a true and correct copy of Amendment No. 3 to the GTA, dated March 11, 2013.

7. Attached hereto as **Exhibit 6** is a true and correct copy of Amendment No. 4 to the GTA, dated April 10, 2017.

Dated: New York, New York
December 17, 2020

/s/ Wanda D. French-Brown
WANDA D. FRENCH-BROWN